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June 14th, 2022

Judge George B. Daniels
Southern District of New York
Daniel Patrick Moynihan
United States District Court
500 Pearl Street - Courtroom 11A
New York, New York 10007

Re: Antolini vs. McCloskey, et al
Case No.: 1:19-cv-09038-GBD

Dear Judge Daniels,

To remind the Court, respectfully, I represent Plaintiff in this matter and write to request a re-opening of the time for Plaintiff to file a motion for reconsideration of the Court's May 26, 2022, order.

By way of background, the Court issued its order affirming Judge Aaron's November 19, 2021, Report and Recommendation denying Plaintiff's motion for sanctions, and granting Defendants' motion for sanctions. See Dkt. No. 284. On June 2, 2022, Plaintiff moved to stay the sanctions order pending his forthcoming motion for reconsideration. See Dkt. No 286. The Court denied Plaintiff's motion to stay on June 8, 2022.

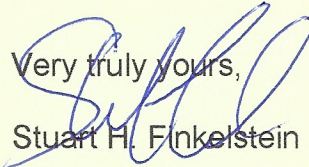
Herein, Plaintiff requests a brief re-opening of the time for him to file his Rule 6.3 reconsideration motion. Plaintiff gave timely notice that he intended to file the motion, as required by Rule 6.3. However, Plaintiff's counsel was out of the office this past week due to a severe illness and was unable to contact the Court until today. Plaintiff requests only that he be given one week to file the motion. There is no prejudice to Defendants as the original deadline date was Friday June 10 and all Plaintiff is asking for is another eight business days.

Further, Plaintiff believes this request is extremely appropriate given the nature of the relief sought. Plaintiff and his counsel will explain to the Court not only why he believes that the May 26, 2022, order was wrongly decided, but also that they are unable to pay the exorbitant monetary fines levied. Plaintiff will request that the Court show leniency such that there can be some sort of arrangement

As a solo practitioner with immuno-compromised family members living with him, Plaintiff's counsel sincerely hopes that the Court be willing to allocate just a few more days to make instant motion and explain his position regarding finances to the Court. This case *is in its third calendar year* and one a few more days of time does not hurt anyone and ensures that Plaintiff's submissions provide the detail and attention necessary to properly explain the situation to the Court.

Plaintiff's request is not unreasonable or prejudicial. Plaintiff prays that this Court must allow him the appropriate time to make the motion, explain his position to the Court, and come to a fair and just resolution.

Thank you for your consideration of this matter.

Very truly yours,

Stuart H. Finkelstein

SHF/tc
To all via ECF